

Federal Defenders
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
Attorney-in-Charge

November 27, 2022

VIA ECF & EMAIL

Magistrate Judge Lois Bloom
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Brian Migliore, 22-MG-1224 (RLM)

Dear Judge Bloom:

I write on behalf of the defendant with the consent of the government to request that Mr. Migliore be produced to the courthouse on Tuesday, November 29, 2022, in order to participate in a video teleconference with his wife from the Marshals' pens. Mr. Migliore's wife gave birth to the couple's daughter on Saturday November 26, 2022. As she resides in Brazil, it has been difficult for the couple to communicate. Additionally, Mr. Migliore has been ordered removed in custody and will likely be transported to the District of Columbia shortly. The requested call may be the only opportunity for Mr. Migliore to see his newborn daughter and wife in the near future.

If the Court grants this request, the government has indicated it can 475 Mr. Migliore to the courthouse on Tuesday November 29, 2022. Defense counsel will coordinate with the Marshals and the magistrate clericals to make arrangement to access the remote video link previously used for remote arraignments. I thank the Court in advance for its consideration in this matter.

Respectfully Submitted,

_____/s/
Michelle A. Gelernt
Deputy Attorney-in-Charge
(718) 330-1204

cc. Nina Gupta, AUSA [by email & ECF]
Clerk of the Court [by ECF]